

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 20-203 (PAM/KMM)

United States of America,

Plaintiff,

v.

**MOTION FOR RELEASE
OF BRADY MATERIALS**

Francisco Manuel Rodriguez Valenzuela,

Defendant.

Defendant Francisco Manuel Rodriguez Valenzuela, by and through his attorney, Steven J. Wright, respectfully moves the Court, pursuant to the authority of *Brady v. Maryland*, 373 U.S. 83 (1963); *Miller v. Pate*, 386 U.S. 1 (1967); *Giles v. Maryland*, 386 U.S. 66 (1967); and *Moore v. Illinois*, 408 U.S. 786 (1972), for an order compelling disclosure of any evidence in the possession of the prosecution or any of its agents, or other evidence the existence of which is known, or by the exercise of due diligence may become known, to the prosecution, which may be favorable to Defendant, or which could reasonably weaken or affect any evidence that may be introduced against Defendant, or which is otherwise relevant to the subject matter of this case and may in any manner aid Defendant in the investigation or preparation of his case for trial or sentencing. This disclosure is to be made without regard to whether the evidence

to be disclosed may be admissible at trial, and it should include but is not limited to the following:

1. Any identification of persons other than the defendant by eyewitnesses to the crime.
2. Any failure to identify Defendant by any eyewitness to the crime.
3. Any statements of any witnesses, whether indicted or not, that in any way exculpate Defendant.
4. Any statements of any witnesses, whether indicted or not, that contradict statements of other witnesses.
5. Any reports of interviews relating to Nos. 3 or 4.
6. Any fingerprints, handwriting, or other scientific evidence that was not identified with Defendant.
7. Any items seized from individuals not charged that tend to identify those individuals with the commission of elements of the offenses charged in the indictment of the crime.
8. Any prior convictions, and all documents and reports reflecting the circumstances of and compensation for, prospective government witnesses.
9. Any offers or promises made to prospective government witnesses to induce their cooperation against the defendants, whether or not the government intends to call those persons as witnesses.
10. A copy of all videotapes and audiotapes of events relating to the offenses charged in the indictment, in both their original and adulterated forms.

Respectfully submitted,

Dated: October 11, 2020

/s/ Steven J. Wright
Minnesota Attorney #387336
331 Second Ave South, Ste 705
Minneapolis, MN 55401
(612) 669-8280

Attorney for Defendant